

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS - EASTERN DIVISION**

IN RE:

BRADFORD EARL HERRICK, JR. A/K/A	Case No. 11-20889 - JNF
BRADFORD E. HERRICK, JR., A/K/A	Chapter 7
BRADFORD HERRICK,	
Debtor	

**STIPULATION RESOLVING THE MOTION OF WELLS FARGO BANK, N.A.
FOR RELIEF FROM THE AUTOMATIC STAY**

This Stipulation is entered into by Wells Fargo Bank, N.A., formerly known as Wachovia Mortgage, FSB, f/k/a World Savings Bank, FSB (the “Lender”) and Bradford Earl Herrick, Jr. a/k/a Bradford E. Herrick, Jr., a/k/a Bradford Herrick (the “Debtor”).

WHEREAS, the Debtor commenced the above-captioned proceeding by the filing of a voluntary petition under Chapter 7 on November 18, 2011.

WHEREAS, the Debtor is the owner of that certain real estate and improvements located at 70 Ash Street, West Bridgewater, Massachusetts (the “Premises”).

WHEREAS, on December 6, 2011, the Lender filed its Motion for Relief from the Automatic Stay (the “Motion”) due to the failure of the Debtor to make regular, timely postpetition mortgage payments to the Lender.

WHEREAS, the Debtor filed an Objection to the Lender’s Motion for Relief from the Automatic Stay.

WHEREAS, the Lender and the Debtor have agreed to stipulate to certain terms regarding the Lender’s Motion for Relief from the Automatic Stay.

IT IS THEREFORE STIPULATED AS FOLLOWS:

1. That the Motion of the Lender and the relief sought therein under 11 U.S.C. § 362(d) is **granted BUT STAYED until April 30, 2012**, pursuant to Federal and State law, with respect to the real estate and improvements identified as that certain parcel of land with all buildings and improvements thereon (the “Premises”), located at 70 Ash Street,

West Bridgewater, MA, and described in that certain mortgage recorded in the Plymouth County Registry of Deeds, in Book 34717 at Page 203; and

2. That the Lender and/or its successors and/or assigns is specifically authorized to exercise its rights under its loan documents, pursuant to Federal and State law, including the power of sale contained in its mortgage and to exercise its summary process rights with respect to the Premises should the Lender, and/or its successors and/or assigns become the successful bidder at foreclosure.

3. This Stipulation is subject to the approval of the Bankruptcy Court. Upon approval by the Bankruptcy Court, this Stipulation shall have the effect of an order of the Court.

WELLS FARGO BANK, N.A.

By its Attorneys,

PARTRIDGE SNOW & HAHN LLP

/s/ Catherine V. Eastwood

Catherine V. Eastwood (BBO#641665)
2364 Post Road, Suite 100
Warwick, RI 02886
(401)681-1900/FAX(401)681-1910
cve@psh.com
Dated: April 20, 2012

BRADFORD EARL HERRICK, JR.

By his Attorney,

/s/ Neil J. Berman

Neil J. Berman (BBO #566784)
109 College Avenue
Somerville, MA 02144
Dated: April 20, 2012

CERTIFICATE OF SERVICE

I hereby certify that on the 20th of April, 2012, I electronically filed a Stipulation with the Clerk of the Bankruptcy Court using the CM/ECF System. The following participants have received notice electronically:

John Fitzgerald, Esquire, U.S. Trustee
Debora Casey, Esquire, Trustee
Neil J. Berman, Esquire, Counsel for Debtor

and I hereby certify that a copy of the Stipulation was served by regular, first class mail, to the following interested parties as set forth below:

Bradford Earl Herrick, Jr. a/k/a Bradford E.
Herrick, Jr., a/k/a Bradford Herrick
70 Ash Street
West Bridgewater, MA 02379

Town of West Bridgewater
Tax Collector
Municipal Building
65 N. Main Street
West Bridgewater, MA 02379

Saraland Investment Corp.
2510 E. Sunset Road
Las Vegas, NV 89120

IRS Insolvency
Attn: ADR
P.O. Box 9112, Stop 20800
John F. Kennedy Building
25 New Sudbury Street
Boston, MA 02203

/s/ Catherine V. Eastwood

Catherine V. Eastwood

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